



**THE CITY OF NEW YORK  
LAW DEPARTMENT**

**MURIEL GOODE-TRUFANT**  
*Corporation Counsel*

100 CHURCH STREET  
NEW YORK, N.Y. 10007

**MAMOON SALEEMI**  
*Assistant Corporation Counsel*  
Tel.: (212) 356-2384  
Fax: (212) 356 3509  
Email: msaleemi@law.nyc.gov

March 7, 2025

**VIA ECF**

The Honorable Jesse M. Furman  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: Raquel Olmo v. Matosleo, et al., 23-CV-10510 (JMF)

Your Honor:

I am an Assistant Corporation Counsel in the office of Muriel Goode-Trufant, Corporation Counsel of the City of New York. Officers Burke, Kopec, Lam, Lieutenant Matosleo, and Captain Lazarus (hereinafter “Defendants”) write to indicate their intention to file a motion for summary judgement and to request that the deadline to file their anticipated motion for summary judgement be held in abeyance until after the settlement conference scheduled for May 21, 2025, should the parties not reach a settlement. Plaintiff consents to this request.

By way of background, on July 2, 2024, a Scheduling Order was issued, setting the deadline for the completion of discovery for November 3, 2024. See ECF No. 20. On August 18, 2024, Plaintiff requested a thirty-day extension of time to complete discovery, which Your Honor granted. See ECF Nos. 24, 25. On December 3, 2024, Defendants requested a forty-five-day extension to complete discovery, which Your Honor granted. See ECF Nos. 32, 33. On January 3, 2025 and February 20, 2025, Plaintiff requested further extensions of time to complete discovery. See ECF Nos. 36, 45. Your Honor granted these requests, setting the latest deadline to complete discovery by February 27, 2025. See ECF Nos. 40, 46. Per Your Honor’s July 2, 2024 Scheduling Order, the parties were ordered to file letters by March 6, 2025 indicating whether they intend to file a motion for summary judgment, and to file any motion for summary judgment by March 29, 2025. See ECF No. 20.

As Your Honor is aware, Magistrate Judge Figueredo scheduled a settlement conference in this action for May 21, 2025. See ECF No. 44. Should Defendants be required to file their motion for summary judgement prior to the settlement conference, Defendants believe that the settlement conference will be futile, as their position on settlement would necessarily depend on the outcome of their anticipated motion, which would be fully dispositive. In the interest

of resolving this matter before any motion is filed, Defendants believe that holding the deadline to file their motion for summary judgment in abeyance until thirty days after the settlement conference is the best course forward. Should Your Honor not be inclined to grant the requested relief, Defendants request, in the alternative, that the scheduled settlement conference be adjourned until after a decision is rendered on their anticipated motion.

As a result of the foregoing, Defendants respectfully request that the deadline to file their anticipated motion for summary judgement be held in abeyance until after the May 21, 2025 settlement conference. In the alternative, Defendants respectfully request that the May 21, 2025 settlement conference be adjourned until after a decision is rendered on their anticipated motion.

Defendants thank the Court for its time and consideration herein.

Respectfully submitted,

/S/ Mamoon Saleemi

Mamoon Saleemi  
Assistant Corporation Counsel  
Special Federal Litigation Division

cc: **VIA FIRST CLASS MAIL**  
Raquel Olmo  
Plaintiff *Pro Se*  
Front 2 Box 1094  
New York, NY 10028

Application GRANTED. The deadline for Defendants' motion for summary judgment is hereby EXTENDED until **thirty days after the settlement conference**. Plaintiff shall file any opposition within **thirty days of the motion**, and any reply shall be filed within **two weeks of the opposition**. (The Court presumes from Plaintiff's silence that she does not intent to move for summary judgment herself. If that is not the case, she should promptly file a letter to that effect, and the Court may adjust the briefing schedule and structure.) To confirm: Discovery in this case is now over. The Clerk of Court is directed to terminate ECF No. 47.

SO ORDERED.



March 7, 2025